



2019-LTR-1015
May 24, 2019

Mr. Dave Bartus
United States Environmental Protection Agency - Region 10
1200 Sixth Avenue
Suite 155, MS 15-H04
Seattle, WA 98101

Dear Mr. Bartus,

Re: Perma-Fix Northwest Richland, Inc. (PFNW)
Mixed Waste Facility
Site Identification Number WAR 000010355
Contingency Plan Implementation Report

At approximately 3:30am PST Friday, May 17th, Perma-Fix Northwest operations personnel extinguished a small fire involving packaging material for non-hazardous radioactive waste that occurred at its Richland facility. The Emergency Coordinator evaluated the criteria in Section G.3 of the Contingency Plan located in Attachment GG of the Resource Conservation and Recovery Act (RCRA)/Toxic Substances Control Act (TSCA) Permit, and concluded that the event did not prompt implementation of the Contingency Plan. The fire did not require a time urgent response from the Fire Department, nor did it pose a threat human health or the environment. Although the Contingency Plan was not implemented, nor did the fire involve any hazardous waste, PFNW notified the Washington State Department of Ecology (WDOE) of the incident that same morning. In accordance with radiological license requirements, the Washington State Department of Health was also notified and arrived at the facility the morning of Friday, May 17th.

WDOE arrived at the PFNW facility on Monday, May 20th for an inspection of the event, and disagreed with the decision to not implement the Contingency Plan. WDOE stated that they would further evaluate their determination; however to ensure compliance, PFNW is submitting this Contingency Plan Implementation Report within 7 days of the event, as required by Section G.4.7 of the Contingency Plan.

Name, address, and telephone number of the owner or operator

Perma-Fix Northwest Richland, Inc.
2025 Battelle Blvd.
Richland, WA 99354
(509) 375-5160

Name, address, and telephone number of the MWF

Perma-Fix Northwest Richland, Inc.
2025 Battelle Blvd.
Richland, WA 99354
(509) 375-5160

Date, time, and type of incident (e.g., fire, explosion)

At approximately 3:30am PST Friday, May 17th, Perma-Fix Northwest operations personnel extinguished a small fire involving packaging material for non-hazardous radioactive waste.

Name and quantity of material(s) involved

The event was associated with a monolith that had been staged for evaluation prior to disposal. The monolith was generated using the GeoMelt® technology developed by Veolia Nuclear Solutions. The treatment process is being performed under the treatability study requirements of WAC 173-303-071(s), however, to date the GeoMelt® process has not been used to treat any hazardous wastes. The monolith associated with the event contained 65 compacted RCRA empty drums, approximately 13,624 pounds of sand and glass forming materials, and four-8 inch diameter graphite electrodes. The material consumed in the fire was clean packaging, cribbing material and non-hazardous trash including; an 84in x 84in x 60in IP-1 bag, miscellaneous PPE and paper padding, and wood cribbing (two-3 foot 2 x 4s, four-4 foot and three-3 foot 4 x 4s). The monolith, cribbing material, and non-hazardous trash were placed inside of the IP-1 bag, and stored on a wooden pallet.

The extent of injuries, if any

There were no injuries.

An assessment of actual or potential hazards to human health or the environment, as applicable

The fire did not involve the treatment process itself or waste material to be processed. The monolith consisted of compacted RCRA empty drums encased in glass and the material consumed in the fire was clean packaging, trash and cribbing material. Surveys performed using monitoring equipment situated at the facility did not detect any environmental or radiological release as a result the fire. PFNW is confident that there was not a release of radioactive or hazardous material as a result of this event, and officials from the Washington State Department of Health have initially agreed with this assertion.

PFNW operations personnel were able to extinguish the fire themselves, however as an additional precaution, the staff notified the Richland Fire Department. The fire department determined the situation was under control and left the facility within one hour of arrival.

Estimated quantity and disposition of recovered material that resulted from the incident

Two 55-gallon drums were used to collect the remaining debris and residue that was not consumed as a result of the incident. Samples have been taken to characterize the collected material, and we are currently awaiting the results of that analysis. These containers are being managed in a permitted storage area until the sample analysis is available.

Cause of incident

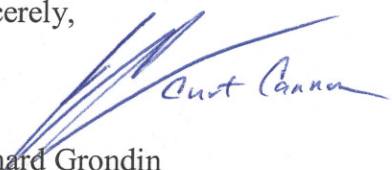
A root cause analysis is currently underway; however, the immediate cause of the incident has been determined to be a result of packaging the monolith prior to allowing it to cool sufficiently.

Description of corrective action taken to prevent reoccurrence of the incident

PFNW has joined with Veolia Nuclear Solutions Federal Services (VNSFS) to conduct a full review of what factors led to the fire and ensure appropriate measures are in place to prevent a similar situation in the future. A root cause analysis, including identifying corrective actions, is underway. Melting operations are on hold until the root cause is identified and corrective actions have been implemented.

If you have any questions regarding the information in this report, please feel free to contact me at (509) 375-7026.

Sincerely,


for Richard Grondin
Perma-Fix Northwest Richland, Inc.
Vice-President and General Manager

cc:

Kathy Conaway, WDOE
Jared Mathey, WDOE
Stephanie Schleif, WDOE

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Certification Statement

The following certification statement fulfills the requirements of Hazardous Waste Management Act, in accordance with WAC 173-303-810(13)(a), and Toxic Substance Control Act, in accordance with 40 CFR 761.3, for Perma-Fix Northwest Richland, Inc. permit for the Storage and Treatment of Mixed Waste and for the Storage and Disposal of Mixed-Toxic Substance Control Act (TSCA) Regulated Polychlorinated Biphenyl (PCB) Wastes.

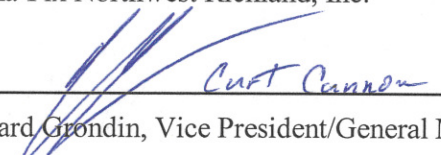
The certification below covers the documentation and submission of the Contingency Plan Implementation Report submitted in letter No. 2019-LTR-1015, dated May 24, 2019.

As the Vice President/General Manager of the Mixed Waste Facility, I have the authority to certify on behalf of the corporation.

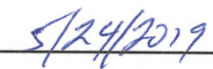
HWMA CERTIFICATION
[WAC 173-303-810(13)(a)]

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Perma-Fix Northwest Richland, Inc.



for Richard Grondin, Vice President/General Manager



Date: May 24, 2019